

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

NOTICE OF REMOVAL

Pursuant to 28 U.S.C. Sections 1441 and 1446, the Defendant Village of Schaumburg, by its attorneys The Sotos Law Firm, P.C., hereby removes the above captioned action from the Circuit Court of Cook County, Illinois, to the United States District Court for the Northern District of Illinois, Eastern Division. In support thereof, Defendant states as follows:

1. On June 28, 2013, the above entitled action was commenced in the Circuit Court of Cook County, Illinois, as Case No. 2013 L 7458, and is pending in that Court.
2. The removing party is a defendant in that action. A copy of the Complaint, which comprises all of the pleadings known by the Defendant Village of Schaumburg to date, is attached to this Notice of Removal as Exhibit A.
3. In this action, Plaintiff purports to present three federal claims pursuant to 42 U.S.C. Section 1983 against the individual Defendants John Cichy and Terrance O'Brien: false arrest, Fourteen Amendment due process, and civil conspiracy. In addition, Plaintiff has brought a state law negligent supervision claim against the Village of Schaumburg, as well as a demand for indemnification.

4. This Court has original jurisdiction over this action pursuant to 28 U.S.C. Section 1331 and 1333 in that three Counts of Plaintiff's Complaint arise under federal law and seeks to redress alleged deprivations, under State law, of rights secured by the Constitution of the United States.

5. Venue is proper in the Northern District of Illinois, Eastern Division, in that Cook County is within the Northern District, Eastern Division.

6. Removal is timely in that this Notice is being filed within 30 days after Defendant received notice of this lawsuit, pursuant to 28 U.S.C. Section 1446(b).

7. All Defendants join in this Notice of Removal.

8. Written notice of this Notice of Removal is being promptly sent to Plaintiff's counsel and to the Clerk of the Circuit Court of Cook County, Illinois by facsimile and first class mail on Thursday, July 11, 2013.

WHEREFORE, Defendant Village of Schaumburg, hereby removes this action to the United States District Court for the Northern District of Illinois, Eastern Division.

RESPECTFULLY SUBMITTED,

Dated: July 10, 2013

/s/John J. Timbo

JOHN J. TIMBO, Attorney No. 6238251

One of the Attorneys for Village of Schaumburg

James G. Sotos
John J. Timbo
THE SOTOS LAW FIRM, P.C.
550 E. Devon Ave., Suite 150
Itasca, IL 60143
Tel: (630) 735-3300
jtimbo@jsotoslaw.com

CERTIFICATE OF SERVICE

The undersigned certifies that service of the foregoing NOTICE OF REMOVAL was made by facsimile and by mailing a true and correct copy thereof to the following individuals on July 11, 2013:

Counsel for Plaintiff:

Jeffrey S. Deutschman
Bradley A. Skafish
Deutschman & Associates, P.C.
77 West Washington Street, Suite 1525
Chicago, IL 60602

/s/John J. Timbo

JOHN J. TIMBO, Attorney No. 6238251

One of the Attorneys for Village of Schaumburg